

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Sean Sullivan, being sworn, depose and state as follows in support of my application for a complaint charging that, on or about February 11, 2024, in the District of Massachusetts, ISAAH J. JOHNSON (DOB: xx/xx/2001) (hereinafter “JOHNSON”) did commit the offense of firearm trafficking, in violation of 18 U.S.C. § 922(a)(5) (the “Target Offense”).

INTRODUCTION

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since 2014. I am responsible for the investigation and enforcement of violations of federal firearms laws. I am presently assigned to the ATF’s Bridgewater Field Office and specifically focus on crimes of violence perpetrated by felons and other prohibited persons who illegally possess and/or purchase firearms, criminal organizations, gangs, and narcotics trafficking groups.

2. As a Special Agent with ATF, I am aware that it is a violation of 18 U.S.C. § 922(a)(5) for any person (other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector) to transfer, sell, trade, give, transport, or deliver any firearm to any person (other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector) who the transferor knows or has reasonable cause to believe does not reside in the State in which the transferor resides, with certain exceptions that are not relevant here.

3. The information contained in this affidavit is based on my own investigation and investigative efforts by other law enforcement officers. The dates and times in this affidavit are

approximate. Because this affidavit is submitted for the limited purpose of supporting the issuance of a criminal complaint and arrest warrant for JOHNSON, I have not set forth every fact learned during the investigation or recounted every investigative technique employed. Rather, I am only setting forth information necessary to establish probable cause for the issuance of the complaint.

PROBABLE CAUSE

4. In 2024, the Massachusetts Attorney General's Office, the Massachusetts State Police, and the Brockton Police Department conducted an investigation called "Operation Hellcat" into a high-end car theft enterprise, which was responsible for approximately 63 stolen vehicles worth more than \$2.6 million. Approximately 38 federal, state, and local law enforcement agencies participated in this operation. The investigation culminated in the execution of search and arrest warrants at 12 locations across Southeastern Massachusetts on December 12, 2024, and the arrests of at least 12 individuals.

5. One of the "Operation Hellcat" targets was CO-CONSPIRATOR, an adult male born in 2004 who resided in Massachusetts. Investigators viewed a video posted to CO-CONSPIRATOR's YouTube page on or about July 13, 2024 entitled "Glock 19x with switch n Glock 23." The video depicted two individuals – one of whom they identified as CO-CONSPIRATOR, based upon a distinctive tattoo on his hand – shooting fully automatic Glock-style handguns equipped with "selector switches"¹ into the air. The firearm in CO-CONSPIRATOR's hand was a tan-colored pistol with a rail-mounted flashlight/laser attachment. Investigators identified the location of the video as the area of the Huntington Therapeutic Day School, an alternative public school at 596 Summer Street in Brockton, MA. On July 17, 2024, a

¹ A "selector switch" is a machine gun conversion device that converts a semi-automatic pistol into a fully automatic machine gun.

custodian at the school contacted Brockton Police to report numerous shell casings located in the area. Officers responded and collected approximately forty-three 9-millimeter shell casings and ten .40 caliber shell casings.² Investigators viewed several additional videos on CO-CONSPIRATOR's YouTube page depicting the tan-colored Glock-style pistol during the investigation. One of those videos depicted the firearm along with a large-capacity 33-round magazine.

6. On December 12, 2024 at approximately 6:00 a.m., investigators executed a search warrant at CO-CONSPIRATOR's residence, a single-family house in Brockton, MA. They found CO-CONSPIRATOR inside and placed him under arrest. During their search of the residence, investigators located a tan-colored 9-millimeter Glock 19X semi-automatic pistol, bearing serial number CBVG542, as well as two large-capacity magazines.³ CO-CONSPIRATOR did not possess a license to carry firearms in Massachusetts and was ineligible for such a license because he was under 21 years of age. Investigators also seized a cellular phone, assigned number 774-xxx-xxxx, belonging to CO-CONSPIRATOR. CO-CONSPIRATOR was charged in separate Brockton District Court complaints with Breaking and Entering a Vehicle in the Nighttime to Commit a Felony (4 counts), Receiving Stolen Property, Possession of a Machine Gun, Possession of a Large Capacity Firearm (2 counts), Possession of Ammunition without FID Card, and Possession of a Firearm without FID Card.

² I am aware that a Glock 19X is designed and manufactured to fire 9-millimeter ammunition, and a Glock 23 is designed and manufactured to fire .40 caliber ammunition.

³ The pistol was later examined by the Massachusetts State Police and confirmed to be a working firearm. The test-fired shell casing(s) were entered into the National Integrated Ballistic Information Network (NIBIN), which returned a presumptive match to the 9-millimeter shell casing(s) recovered from the Huntington Therapeutic Day School on July 17, 2024.

7. On December 18, 2024, investigators received a trace on the Glock 19X, bearing serial number CBVG542, that was recovered from CO-CONSPIRATOR's Brockton residence. They determined that this firearm was purchased by JOHNSON on February 3, 2024 at Northeast Munitions LLC, 416 Daniel Webster Highway, Merrimack NH, a federally licensed firearm dealer. At the time of this firearm purchase, JOHNSON presented his New Hampshire driver's license to verify his identity and his in-state residency. JOHNSON's driver's license listed an address in Merrimack, NH.

8. On January 3, 2025, investigators obtained a warrant to search the cellular phone assigned number 774-xxx-xxxx belonging to CO-CONSPIRATOR. The forensic extraction of that phone revealed a series of iMessages between CO-CONSPIRATOR's phone and number 603-xxx-xxxx, which was saved as "Zay." Investigators confirmed that phone number 603-xxx-xxxx belonged to JOHNSON.⁴ In January 2024, the messages discussed using firearms at the firing range, recording videos, and posting the videos on CO-CONSPIRATOR's YouTube page. Beginning on January 30, 2024, the messages discussed JOHNSON purchasing a Glock 19X for CO-CONSPIRATOR. Screenshots of these messages follow:⁵

⁴ A search of CLEAR, a law enforcement database, indicated that this phone number is associated with JOHNSON. The 603 area code encompasses the state of New Hampshire. In the text messages captioned below, the user of this phone number provided his Cash App username as "\$isaiahjohnsonn7". Cash App records for that user account, described below in Paragraph 11, listed JOHNSON as the subscriber and 603-xxx-xxxx as his phone number. The content of the messages is also consistent with JOHNSON being the known purchaser of the Glock 19X recovered in CO-CONSPIRATOR's residence.

⁵ The time and date stamps on the messages are expressed in Universal Coordinated Time (UTC). Subtract five hours to convert to local eastern time in January and February (UTC-5).

<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:04:29.000 PM And I got my half for the g19</div><div>✓ Received +1603 [REDACTED] 1/30/2024 10:04:35.000 PM just tough to make \$ on shorts</div></div>	<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:05:05.000 PM And I jus cashapp yu and yu get it ?</div><div>✓ Received +1603 [REDACTED] 1/30/2024 10:05:46.000 PM no i didn't</div></div>
<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:04:43.000 PM Lmk we can buy it whenever</div><div>✓ Received +1603 [REDACTED] 1/30/2024 10:04:47.000 PM bet lmk what day y'all wanna slide</div></div>	<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:06:09.000 PM *can I ?</div><div>✓ Received +1603 [REDACTED] 1/30/2024 10:06:37.000 PM yes u have my cashapp</div></div>

<div><div>+1603 [REDACTED] 1/30/2024 10:09:39.000 PM ya send it ima go tomorrow</div><div>+1603 [REDACTED] 1/30/2024 10:09:57.000 PM is g around rn</div></div>	<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:10:54.000 PM G19 x</div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:10:59.000 PM The tan one</div></div>
<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/30/2024 10:10:18.000 PM Idk</div><div>+1603 [REDACTED] 1/30/2024 10:10:41.000 PM which one am i buying</div></div>	<div><div>+1603 [REDACTED] 1/30/2024 10:11:54.000 PM send some attachments we should get we can buy them next week</div></div>

Local User
<EXTRACTION_FS_AFU.zip>
1/30/2024 10:13:28.000 PM
A o light laser

Local User
<EXTRACTION_FS_AFU.zip>
1/30/2024 10:13:33.000 PM
😂😂

+1603 [REDACTED]
1/30/2024 10:30:03.000 PM
how much can we get one for

Local User
<EXTRACTION_FS_AFU.zip>
1/30/2024 10:30:30.000 PM
Idk I'll pay for it

Local User
<EXTRACTION_FS_AFU.zip>
1/31/2024 9:46:51.000 PM
Send me ur cashapp

+1603 [REDACTED]
1/31/2024 10:08:35.000 PM
\$isaiahjohnsonn7

Local User
<EXTRACTION_FS_AFU.zip>
1/31/2024 10:36:09.000 PM
Yu got the cashapp?

+1603 [REDACTED]
1/31/2024 11:05:04.000 PM
got it

Local User
<EXTRACTION_FS_AFU.zip>
1/31/2024 11:05:21.000 PM
Try to get it tmr

Local User
<EXTRACTION_FS_AFU.zip>
1/31/2024 11:05:40.000 PM
The laser n shii like 150 ima try to get it this weekend

+1603 [REDACTED]
1/31/2024 11:07:00.000 PM
Ya i will

+1603 [REDACTED]
1/31/2024 11:07:09.000 PM
ima hit 2 other stores tho to make sure we get a good price

+1603 [REDACTED]
1/31/2024 11:07:14.000 PM
that laser gonna be crazy

<div><div>Local User <EXTRACTION_FS_AFU.zip> 1/31/2024 11:07:23.000 PM Liked "ima hit 2 other stores tho to make sure we get a g..." ^ Sent</div><div>Local User <EXTRACTION_FS_AFU.zip> 1/31/2024 11:07:35.000 PM I don't think we gunna miss ^ Sent</div><div>Local User <EXTRACTION_FS_AFU.zip> 1/31/2024 11:07:39.000 PM 😂😂 ^ Sent</div></div>	<div>+1603 [REDACTED] 1/31/2024 11:08:21.000 PM Gonna be some good content too ✓ Received</div> <div>+1603 [REDACTED] 1/31/2024 11:08:28.000 PM i'll text u when i hit the stores tomorrow ✓ Received</div> <div>Local User <EXTRACTION_FS_AFU.zip> 1/31/2024 11:08:36.000 PM Igh ^ Sent</div> <div>+1603 [REDACTED] 2/1/2024 8:18:40.000 PM we just get the funds than hit u with the steel 👤👤 ✓ Received</div>
<div>Local User <EXTRACTION_FS_AFU.zip> 2/1/2024 8:33:19.000 PM Send pictures 📷 ^ Sent</div> <div>Local User <EXTRACTION_FS_AFU.zip> 2/2/2024 10:02:46.000 PM Yoo yu got it ? ^ Sent</div> <div>+1603 [REDACTED] 2/2/2024 10:04:19.000 PM nah not yet been watching kids all day ✓ Received</div>	<div>Local User <EXTRACTION_FS_AFU.zip> 2/2/2024 10:04:43.000 PM I wanted to come this weekend to shoot it ^ Sent</div> <div>+1603 [REDACTED] 2/2/2024 10:05:14.000 PM U can i will call [REDACTED] and see when she will be home ✓ Received</div> <div>+1603 [REDACTED] 2/2/2024 10:05:26.000 PM i wanted to hit another store to see if we can get a cheaper price ✓ Received</div> <div>Local User <EXTRACTION_FS_AFU.zip> 2/2/2024 10:05:39.000 PM Look on online ^ Sent</div>

+1603 [REDACTED] ✓ Received
2/2/2024 10:30:01.000 PM



<https://www.northeastmunitions.com/s/glock%2019>

+1603 [REDACTED] ✓ Received
2/2/2024 10:30:01.000 PM
cheaper ones here

Local User
<EXTRACTION_FS_AFU.zip> ✓ Sent
2/2/2024 10:37:58.000 PM
They don't have the x

Local User
<EXTRACTION_FS_AFU.zip> ✓ Sent
2/2/2024 10:38:10.000 PM
19x

+1603 [REDACTED] ✓ Received
2/2/2024 10:43:24.000 PM
true

+1603 [REDACTED] ✓ Received
2/2/2024 10:43:29.000 PM
what day u wanna slide

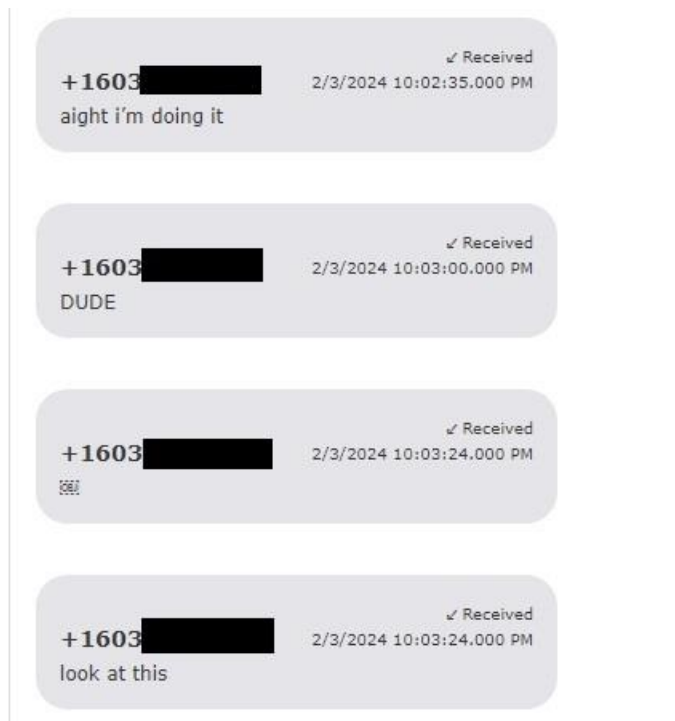
+1603 [REDACTED] ✓ Received
2/2/2024 10:43:46.000 PM
i will go to hudson and buy it

Local User
<EXTRACTION_FS_AFU.zip> ✓ Sent
2/2/2024 11:13:39.000 PM
I was try come out there this weekend

+1603 [REDACTED] ✓ Received
2/3/2024 10:01:19.000 PM

Local User
<EXTRACTION_FS_AFU.zip> ✓ Sent
2/3/2024 10:01:40.000 PM
Let's good to me

Local User
<EXTRACTION_FS_AFU.zip> ✓ Sent
2/3/2024 10:01:47.000 PM
Looks



9. At 10:01 p.m. (UTC) on February 3, 2024, CO-CONSPIRATOR's phone accessed the following image:



10. At 10:04 p.m. (UTC) on February 3, 2024, CO-CONSPIRATOR's phone accessed the following image:



11. On or about May 8, 2025, I received records produced by Block, Inc. in response to a subpoena for Cash App records associated with user \$isaiahjohnsonn7. The records confirmed that JOHNSON was the listed subscriber for that user account.⁶ Within his transaction history, I located a payment of \$315.00 to JOHNSON's account at 22:34:26 UTC on January 31, 2024 sent from CO-CONSPIRATOR's account.⁷ JOHNSON received this payment approximately 1 minute and 43 seconds before CO-CONSPIRATOR sent JOHNSON a text message asking, "Yu got the cashapp?" – to which JOHNSON replied, "got it" (see Paragraph 8 above).

12. CO-CONSPIRATOR's cellular phone recorded its physical location with GPS coordinates during various device events, including when the phone's camera took photographs. Instances of CO-CONSPIRATOR's recorded physical phone locations include:

- a. January 30, 2024 at 1:50 p.m. (UTC-5) – HarborOne Bank in Brockton
- b. February 4, 2024 at 2:56 p.m. (UTC-5) – CO-CONSPIRATOR's residence in Brockton
- c. February 5, 2024 at 10:03 p.m. (UTC-5) – CO-CONSPIRATOR's residence in Brockton
- d. February 9, 2024 at 1:26 a.m. (UTC-5) – CO-CONSPIRATOR's residence in Brockton

13. At 4:34 p.m. (UTC-5) on February 9, 2024, CO-CONSPIRATOR's phone accessed the following image:

⁶ The records included JOHNSON's name, date of birth, Social Security number, phone number, and Merrimack NH address. The records also included photographs of the front and back of JOHNSON's New Hampshire driver's license issued 08/16/2017 (listing his Merrimack NH address), as well as a "selfie"-style photograph of a bearded male who appears to be JOHNSON.

⁷ The sender's username was a variation on CO-CONSPIRATOR's first name. I observed other transactions in JOHNSON's account history where JOHNSON sent payments to the same username, and there were corresponding text alerts from Cash App in CO-CONSPIRATOR's cell phone message history stating "isaiah johnson sent you \$[...]."



The firearm's serial number is clearly visible in this image, matching the serial number of the firearm purchased by JOHNSON and subsequently located in CO-CONSPIRATOR's residence. An enlargement of that portion of the above image follows:

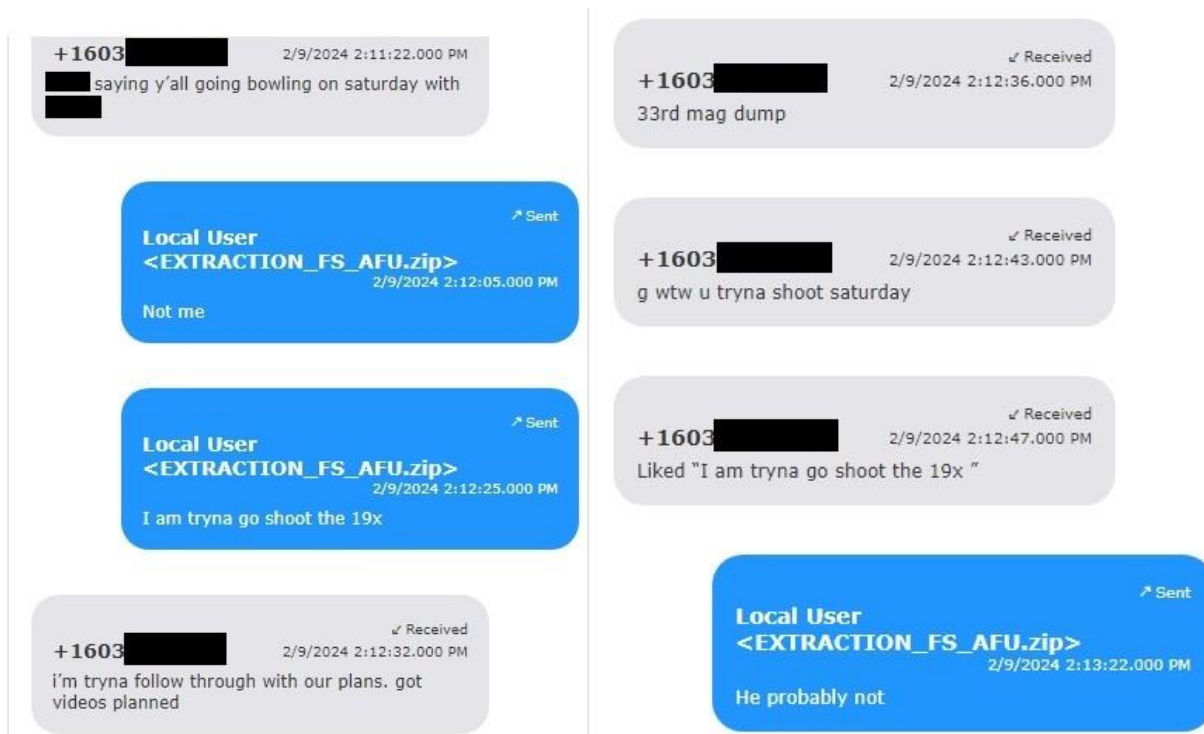


14. At 5:02 p.m. (UTC-5) on February 9, 2024, CO-CONSPIRATOR's phone accessed a video of a white male holding the tan-colored Glock firearm box. The caption on the video reads "when she buy you a glock in her name". Investigators believe the white male to be JOHNSON, based upon a comparison to his driver's license photo. A still image from the video follows:



15. CO-CONSPIRATOR's cellular phone contained a group chat that included CO-CONSPIRATOR and JOHNSON, wherein JOHNSON discussed traveling to Brockton and bringing the Glock 19X to CO-CONSPIRATOR.⁸

a. On February 9, 2024, CO-CONSPIRATOR and JOHNSON discussed plans to go shooting during the upcoming weekend, as well as firearm accessories they could purchase. CO-CONSPIRATOR sent JOHNSON a link to an Amazon.com product page for an "OLIGHT" tactical flashlight/laser attachment for a pistol. Screenshots of these messages follow:



⁸ Some of the group chat messages sent before or after the screenshots excerpted in this paragraph have been omitted.

Local User
<EXTRACTION_FS_AFU.zip>
2/9/2024 2:13:37.000 PM
Yo lemme see how it looks with the 33

Local User
<EXTRACTION_FS_AFU.zip>
2/9/2024 2:16:26.000 PM
Not tan

+1603 [REDACTED]
2/9/2024 2:13:55.000 PM
i'm boutta buy it rn just dropped kids off

+1603 [REDACTED]
2/9/2024 2:17:00.000 PM
👍

+1603 [REDACTED]
2/9/2024 2:13:59.000 PM
gimme 15 minutes

+1603 [REDACTED]
2/9/2024 2:23:38.000 PM
store opens at 10

Local User
<EXTRACTION_FS_AFU.zip>
2/9/2024 2:16:23.000 PM
Get black

Local User
<EXTRACTION_FS_AFU.zip>
2/9/2024 2:32:28.000 PM
The laser is gunna be black

+1603 [REDACTED]
2/9/2024 2:32:42.000 PM
lemme see what one u looking at

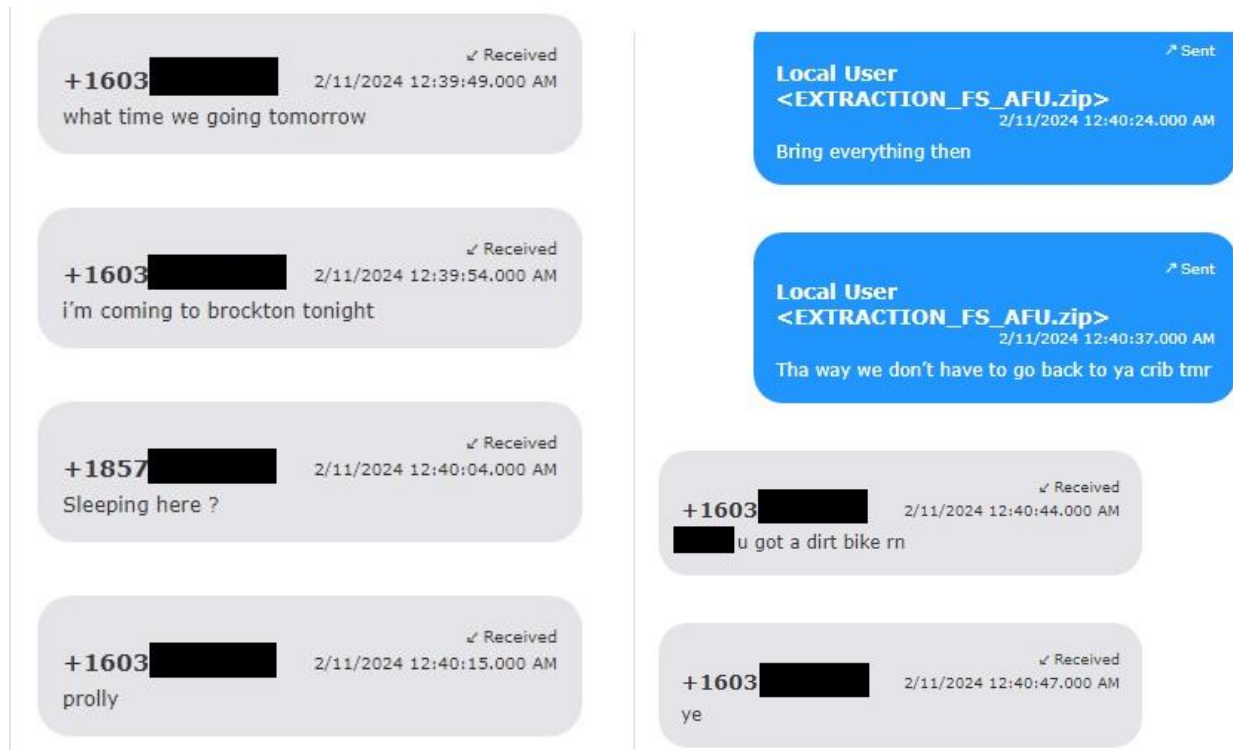
+1603 [REDACTED]
2/9/2024 2:32:48.000 PM
can't wait to see this glock finished

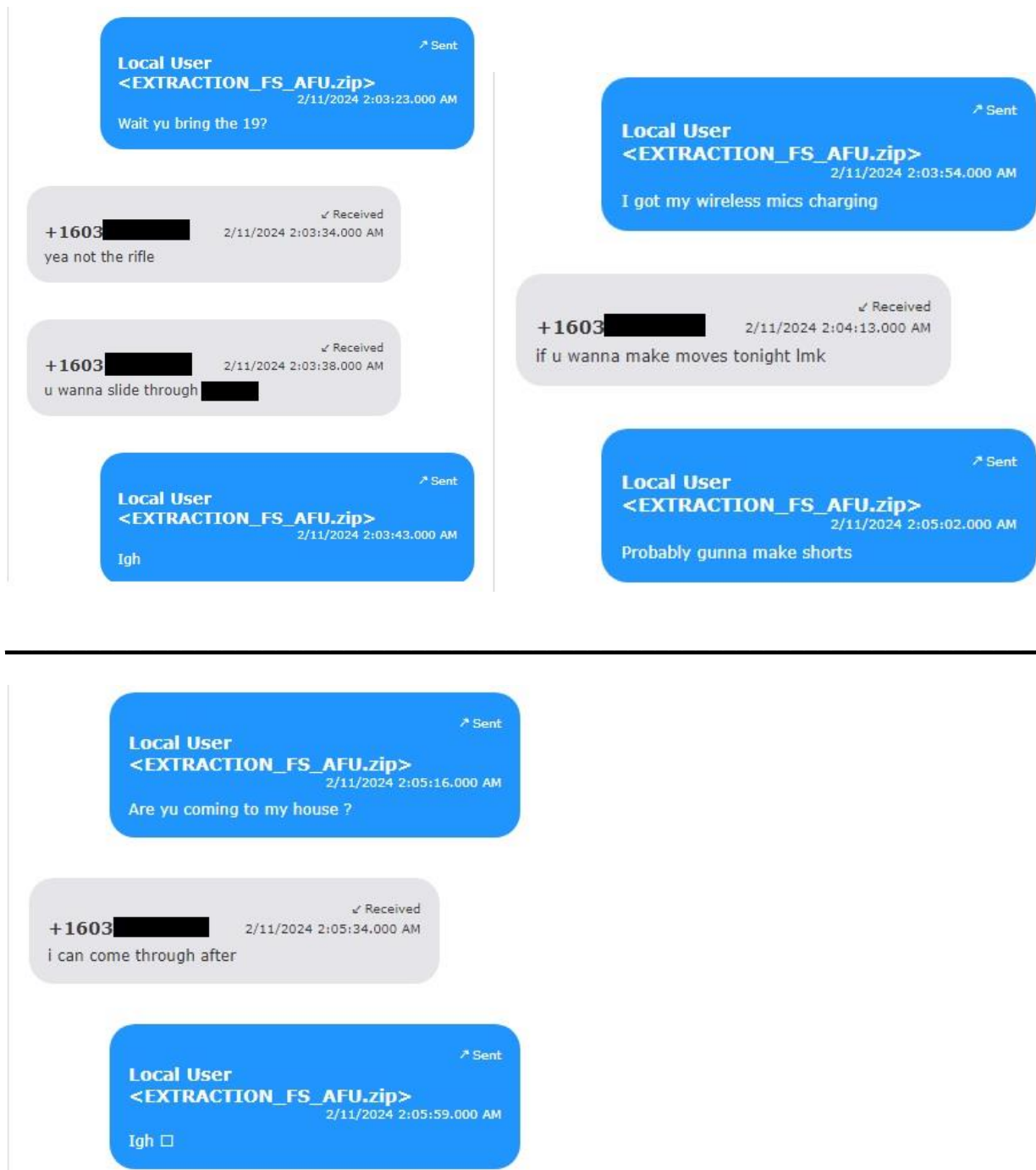
Local User
<EXTRACTION_FS_AFU.zip>
2/9/2024 2:34:51.000 PM
<https://a.co/d/9mrTkQ4>

+1603 [REDACTED]
2/9/2024 2:37:02.000 PM
looks like a good deal

b. On February 10, 2024 (UTC-5), JOHNSON stated that he was coming to Brockton to spend the night, and CO-CONSPIRATOR ensured that JOHNSON was bringing “the 19”.

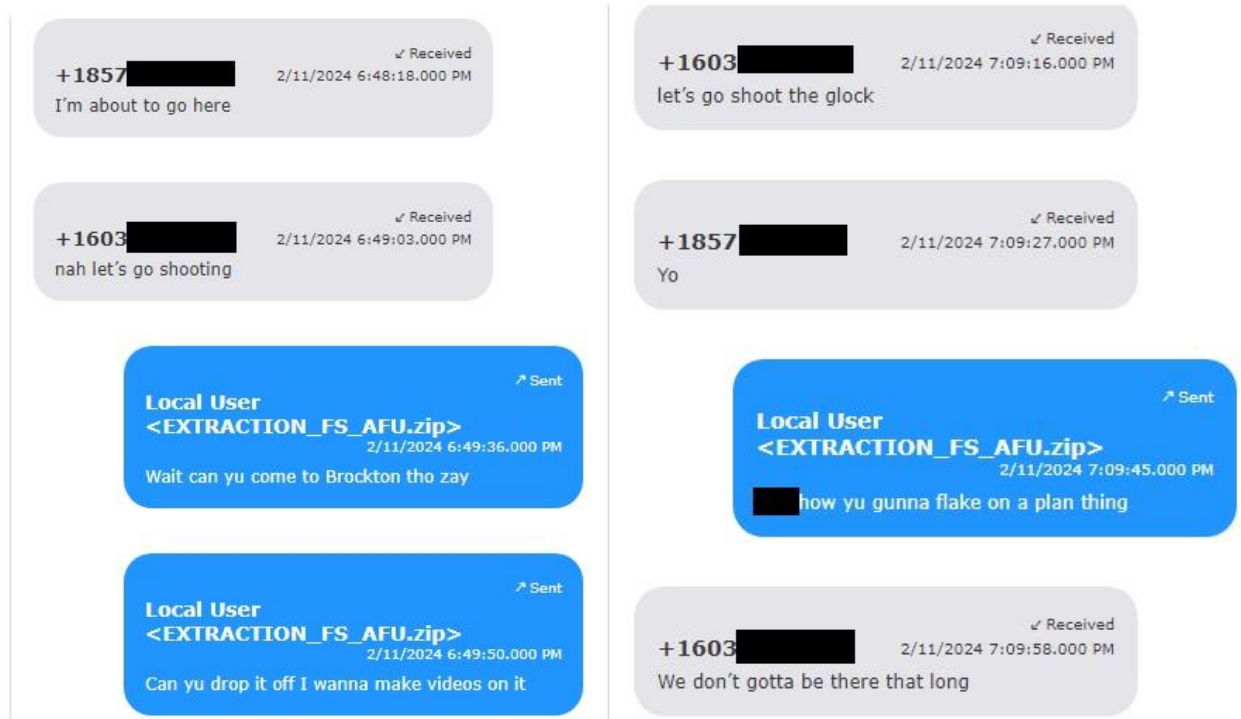
CO-CONSPIRATOR asked JOHNSON if he was coming to “my house”, and JOHNSON said that he would. Screenshots of these messages follow:





c. On February 11, 2024, JOHNSON attempted to persuade CO-CONSPIRATOR and another participant in the group chat to go shoot the Glock. CO-CONSPIRATOR asked JOHNSON to come to Brockton and drop “it” off so that CO-CONSPIRATOR could make videos for his YouTube page. At 9:29 p.m. (UTC-5), JOHNSON asked “did u make a short”

– which suggests that he had already transferred the firearm to CO-CONSPIRATOR by that time. CO-CONSPIRATOR replied “Not yet” and explained that he wanted to improve its appearance by adding the accessories first. Screenshots of these messages follow:



+1603 [REDACTED] 2/11/2024 7:10:52.000 PM ✓ Received

Let's just shoot a couple boxes, make some shorts, and see what upgrades we need on the glock

+1603 [REDACTED] 2/11/2024 7:10:56.000 PM ✓ Received

Liked "Let's just shoot a couple boxes, make some shorts,..."

+1857 [REDACTED] 2/11/2024 7:10:57.000 PM ✓ Received

I told you too lol , ya wakin up at 12 thinkin it's okay to go

Local User
<EXTRACTION_FS_AFU.zip> 2/11/2024 7:12:02.000 PM ↗ Sent

Zay I can pay for ammo it's jus the ride back to Brockton

Local User
<EXTRACTION_FS_AFU.zip> 2/11/2024 7:17:52.000 PM ↗ Sent



Local User
<EXTRACTION_FS_AFU.zip> 2/11/2024 7:18:10.000 PM ↗ Sent

I need to make a vid for my yt today

Local User
<EXTRACTION_FS_AFU.zip> 2/11/2024 7:26:36.000 PM ↗ Sent

Ik I am probably Gunna make a video when yu drop it off

+1603 [REDACTED] 2/12/2024 2:29:39.000 AM ✓ Received

did u make a short

Local User
<EXTRACTION_FS_AFU.zip> 2/12/2024 2:33:06.000 AM ↗ Sent

Not yet

Local User
<EXTRACTION_FS_AFU.zip> 2/12/2024 2:33:23.000 AM ↗ Sent

Tryna get the beam first

Local User
<EXTRACTION_FS_AFU.zip> 2/12/2024 2:33:38.000 AM ↗ Sent

It looks low key plain

+1603 [REDACTED] 2/12/2024 2:33:39.000 AM ✓ Received



+1603 [REDACTED] 2/12/2024 2:33:48.000 AM ✓ Received

needs the extendo

Local User
<EXTRACTION_FS_AFU.zip> 2/12/2024 2:33:53.000 AM ↗ Sent

Ima pay for fastest shipping

16. At 6:30 p.m. (UTC-5) on February 11, 2024, CO-CONSPIRATOR's cellular phone took the following photograph at a GPS location on Summer Street in Brockton (approximately 0.2 miles from the Huntington Therapeutic Day School):



17. Between 8:37 p.m. (UTC-5) and 8:48 p.m. (UTC-5) on February 11, 2024, CO-CONSPIRATOR's cellular phone took a series of photographs depicting CO-CONSPIRATOR holding the tan-colored Glock-style firearm. The GPS location data associated with these photographs confirms that they were taken at CO-CONSPIRATOR's residence in Brockton. An example from these photographs follows:



18. On February 18, 2024, CO-CONSPIRATOR's phone created or accessed several photographs and videos at a firing range. The GPS location data associated with these images confirms that they were taken at Granite State Indoor Range & Gun Shop, located at 2 Hampshire Drive, Hudson NH. The videos depict CO-CONSPIRATOR firing a tan-colored Glock-style semi-automatic pistol with an extended magazine. JOHNSON is also depicted at the firing range in one of the videos, wearing clothing similar to the clothing depicted in the video from February 9, 2024. Still images from the February 18, 2024 videos follow:



19. Also on February 18, 2024, CO-CONSPIRATOR's phone created or accessed additional photographs and videos depicting a tan-colored Glock-style semi-automatic pistol with an extended magazine, as well as an assault-style rifle. The GPS location data associated with

these images confirms that they were taken at JOHNSON's registered address in Merrimack, NH. A separate video accessed by CO-CONSPIRATOR's phone on the same day shows the serial number of the pistol, which matches the serial number of the firearm purchased by JOHNSON. Depicted in the videos are a hand and clothing consistent with JOHNSON's appearance at the firing range on that day. Still images from the February 18, 2024 videos follow:



20. JOHNSON knew and/or had reason to know that CO-CONSPIRATOR was not a resident of New Hampshire. For example:

a. Examination of CO-CONSPIRATOR's cell phone extraction revealed that JOHNSON was in a relationship with CO-CONSPIRATOR's sister around the time of the

firearm purchase. Although CO-CONSPIRATOR's sister was living with JOHNSON in New Hampshire, her family home was in Brockton at CO-CONSPIRATOR's registered address.⁹

b. The entire state of New Hampshire is served by only one area code: 603. However, the phone number CO-CONSPIRATOR used to communicate with JOHNSON had a 774 area code, which encompasses Southeastern Massachusetts.

c. The iMessages captioned in Paragraph 15 indicate that JOHNSON traveled to Brockton and delivered the Glock 19X to CO-CONSPIRATOR on or about February 11, 2024. During this conversation, CO-CONSPIRATOR asked JOHNSON about coming to "my house" and said he would need a ride "back to Brockton" after they went shooting.

d. CO-CONSPIRATOR referenced in his iMessages to JOHNSON having to travel distances to reach JOHNSON. For example:

- i. February 2, 2024
 - CO-CONSPIRATOR: I wanted to come this weekend to shoot it
 - JOHNSON: U can i will call [sister] and see when she will be home
 - ...
 - JOHNSON: what day u wanna slide
 - JOHNSON: i will go to hudson and buy it
 - CO-CONSPIRATOR: I was try come out there this weekend
- ii. May 6, 2024 at 8:39 p.m. (UTC-5)
 - JOHNSON: Aight I'm not home rn
 - CO-CONSPIRATOR: Are yu gunna be home at 9:41?
 - CO-CONSPIRATOR: We get there at 9:41
 - CO-CONSPIRATOR: We alr on the high
- iii. May 27, 2024
 - CO-CONSPIRATOR: Can you bring me to ct
 - CO-CONSPIRATOR: To do the trade
 - CO-CONSPIRATOR: I got bread for ya
- iv. August 10, 2024

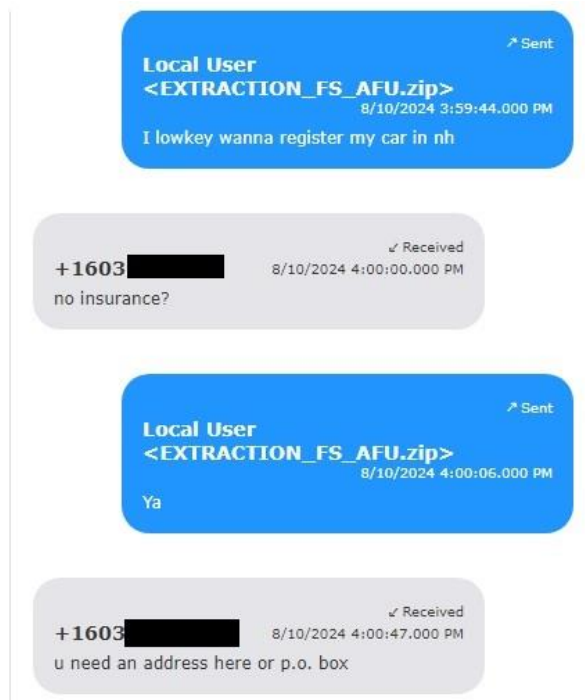
⁹ A search of CLEAR, a law enforcement database, indicated that one of her addresses is JOHNSON's Merrimack NH address, and another is CO-CONSPIRATOR's Brockton MA address.

- JOHNSON: how far from amc Tyngsborough
- CO-CONSPIRATOR: Send the addy
- JOHNSON: 440 middlesex rd
- CO-CONSPIRATOR: 45 mins

e. JOHNSON messaged CO-CONSPIRATOR on June 29, 2024 to ask CO-CONSPIRATOR where he was. When CO-CONSPIRATOR replied that he was at home, JOHNSON stated that he was in Brockton and asked if he could “grab the Glock”:

- JOHNSON: Yo
- JOHNSON: [CO-CONSPIRATOR first name] wya
- CO-CONSPIRATOR: Crib why
- JOHNSON: I’m in Brockton can I grab the Glock

f. JOHNSON demonstrated knowledge that CO-CONSPIRATOR was not a New Hampshire resident in the following iMessage exchange that occurred on August 10, 2024:



21. Neither JOHNSON nor CO-CONSPIRATOR was a federally licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms.

CONCLUSION

22. In summary, beginning on or about January 30, 2024, JOHNSON and CO-CONSPIRATOR unlawfully agreed that JOHNSON, a resident of New Hampshire, would purchase a particular model of firearm for CO-CONSPIRATOR, who was a resident of Massachusetts and was ineligible to purchase or carry firearms in Massachusetts. CO-CONSPIRATOR paid JOHNSON \$315.00 via Cash App on January 31, 2024 to purchase the firearm. On February 3, 2024, JOHNSON went to a licensed firearms dealer in New Hampshire, texted photographs of a tan-colored Glock 19X and an extended magazine to CO-CONSPIRATOR, and purchased the Glock 19X bearing serial number CBVG542. On February 9, 2024, JOHNSON sent another photograph of the firearm to CO-CONSPIRATOR. On or about February 11, 2024, JOHNSON delivered the firearm to CO-CONSPIRATOR, who received and possessed it in Brockton, MA. CO-CONSPIRATOR also possessed the firearm in New Hampshire on February 18, 2024 while JOHNSON was present. CO-CONSPIRATOR was still in possession of the firearm in Brockton on or about July 13, 2024 (when he fired it on the grounds of the Huntington Therapeutic Day School while it was equipped with a selector switch) and on December 12, 2024 (when investigators recovered it at his residence).

23. Based upon the foregoing, there is probable cause to believe that, on or about February 11, 2024, in the District of Massachusetts, JOHNSON did commit the offense of firearm trafficking, in violation of 18 U.S.C. § 922(a)(5).

Attested to under the pains and penalties of perjury by telephone in accordance with Fed.

R. Crim. P. 4.1 on June 6, 2025.

Sean Sullivan

Special Agent Sean Sullivan
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

Electronically sworn to and subscribed telephonically in accordance with Federal Rule
of Criminal Procedure 4.1 on June 6, 2025.



Jennifer C. Boal
HONORABLE JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE